

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**IN RE:
AMANDA NOEL
DEBTORS**

**CHAPTER 7
CASE NO.: 10-51669NPO**

RESPONSE TO MOTION TO REOPEN CHAPTER 7 CASE (DK#32)

COMES NOW Amanda Noel, debtor, by and through her undersigned attorney, James L. Farragut, Jr., and files this her response to Ian Michael Garcino's MOTION TO REOPEN CHAPTER 7 BANKRUPTCY CASE.

1. Debtor admits to the allegations contained in paragraph one (1) of the Motion To Reopen Chapter 7 Case.
2. Debtor admits to the allegations contained in paragraph two (2) of the Motion To Reopen Chapter 7 Case.
3. Debtor admits to the allegations contained in paragraph three (3) of the Motion to Reopen Chapter 7 Case.
4. Debtor admits in part to the allegations contained in paragraph (4) and denies the allegation that the debt has not been satisfied.
5. Debtor admits to the allegations contained in paragraph five (5) of the Motion to Reopen Chapter 7 Case.
6. Debtor admits to the allegations contained in paragraph six (6) of the Motion to Reopen Chapter 7 Case.
7. Debtor admits to the allegations contained in paragraph seven (7) of the Motion to Reopen Chapter 7 Case.

8. Debtor denies the allegations contained in paragraph eight (8) of the Motion to Reopen Chapter 7 Case.

9. Debtor admits to the allegations contained in paragraph nine (9) of the Motion to Reopen Chapter 7 Case.

Debtor prays this Honorable Court will dismiss the Motion To Reopen Case. The Creditor continues to pursue this matter even after discharge of the Debtors Chapter 7 Bankruptcy over 2 years ago and the Debtor feels that this is nothing more than an attempt to harass and intimidate her.

RESPECTFULLY SUBMITTED, this the 13th day of
February, 2013.

/s/ James L. Farragut, Jr.
James L. Farragut, Jr.
Attorney for Debtors

CERTIFICATE OF SERVICE

I, JAMES L. FARRAGUT, JR., Attorney for the above listed debtors, do hereby certify that I have this date mailed a true and correct copy of the above ANSWER TO MOTION FOR AN ADVERSARY PROCEEDING to.

United States Trustee
501 East Court Street
Suite 6-430
Jackson, MS 39201-5022

Kimberly Lentz, Trustee
P.O. Box 927
Gulfport, MS 39502

Ian M. Garcino
13628 Wolf River Road
Gulfport, MS 39503

This the 13th day of February, 2013.

/s/ James L. Farragut, Jr.
James L. Farragut, Jr.

JAMES L. FARRAGUT, JR.
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